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95-176

In the Matter of Closed Captioning and Video Description of Video Programming (FCC 95-484)

From: Roberta A. Cook
P.O. Box 77
Heafford Jct, WI 54532

To: FCC

The captioning issue is critical to me that I will not mince my words in how it should be handled. First of all, I am not sure it is a blessing about having FCC to monitor the captioning scene. Will the industry tremble in fear of FCC that they will act on incorporating captioning into their shows within the deadline as determined by law? If they do not comply in time, what steps will be taken to enforce this on the industry? There must be no weakening on the FCC's part to enforce the captioning as required by law. Closed captioning began roughly around 1980 and it is still in its infancy, especially with the cable shows and the re-run shows. It does not make any sense to me that we are still struggling with this issue sixteen years later.

Other people have spoken for me in their letters to you so I will just cover on the issues that may not have been discussed at great length in their writings.

1.) Quality - captioning quality should never be sacrificed in order to comply with the mandated deadline. This applies to both show producing industry and captioning industry. Captioning firms will crop up every where to get a piece of the pie when the demand and need for captioning grow as the time nears to the deadline. The captioning firms should be made to produce the utmost quality of captions at all times. Of course, standards would have to be set in order to judge the quality of the captions made by the captioning firms. Therefore, every effort must be taken to establish high standards at the first time around so that we would be ensured with high quality of captions. Running out of time to meet the deadline should not be a factor in agreeing to reduce the quality standards. There must be no bending of the standards to please the captioning firms or show producing firms. Instead, THEY SHOULD PLEASE US. After all, we are the customers. In the past, our complaints and suggestions have fallen on their deaf ears.

When you are in the process of establishing a standards committee, there must be a greater percentage of deaf and hh people on it than the industry of either show or caption producers to ensure a greater suggestive and voting power.

2.) Cable shows - I am paying an unfair cable fee each month for 38 channels. My local cable company provide 38 basic channels and I watch only six channels - the networks, Headline News and USA.

My living in a remote area has forced me to purchase a cable service so that my TV could broadcast the shows clearly. The channels I mention provide nearly 100% captions for me to watch. The other channels do not provide captions. CNN does it ONLY occasionally. Therefore, I should pay only 16% of my monthly fee. I want to be able to add the HBO fee to this 16% fee. Only then, I will feel I am equally benefiting from the shows with the hearing folks

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who pay the same full cable service fee as I do. The cable company is not interested in trying to establish a fair fee with me. I am not currently an HBO user - the price is too steep already for me for such a poor service I am receiving from my cable company. In contrast, the TTY users are able to get a somewhat fair discount from the telephone companies for their phone calls.

3.) Chance for Quality Complaints or Grievances - captioning companies should be mandated to put their fax and phone numbers as well as their Email addresses at the end of every show they caption so that the caption watchers could write in to express their complaints. FCC should see that it gets copies of those complaints. If there are no complaints made with a certain captioner, the show producer will go to this captioner and deliver a good show for the caption users. This will ensure the continuation of the business for high quality captioning firms and screen out the poor ones.

In addition, FCC must establish a grievance procedure if a certain show producer or a caption producer fail to comply with the standards. The grievance procedure must not be made such a way that the problem can be prolonged for years before a solution is sought or decided. The procedure should not have to take place in a court. There should be a way to get the problem resolved in the fastest manner possible. A grievance committee should decide on how this manner should be. Again, there should be a greater representative proportion of the deaf and hh on the grievance committee than the captioning and show producer representatives.

4.) Delays or Exceptions - finally, there should not be any extension of the deadline as made by law for the benefit of the industry of both show and captions producers. We had waited for full captioning of all shows for 16 or so years. We gave them a chance to resolve this problem during this long period. Because they took little action in improving the captioning situation, we had to make this into a law.

Thank you for an opportunity to express my feelings about this captioning issue.

 3/12/96

Roberta A. Cook